

EXHIBIT B

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June 8, 2015

VIA EMAIL

Brian Buckley
Fenwick & West LLP
1191 Second Avenue, 10th Floor
Seattle, WA 98101

Re: *BMG Rights Management (US) LLC et al. v. Cox Enterprises, Inc. et al.*, Case No. 1:14-cv-01611-LO-JFA

Brian:

This responds to your June 5, 2015 letter regarding production of personally identifiable information (PII) in response to the Court's May 15, 2015 Order. You indicated that 49 subscribers objected to the disclosure and thus you were not disclosing their PII. According to your letter, these 49 subscribers consist of 32 subscribers from your Exhibit A, worksheet one, which you indicated are current subscribers, and 17 subscribers from Exhibit A, worksheet two, which you indicated are subscribers associated with the IP addresses during the time period identified by Plaintiffs in Exhibit 4 of their motion to compel.

However, the Court's May 15 Order is clear: subscribers that object to the disclosure of their PII must file their objections (e.g., with a motion to quash or protective order) with the Court within 21 days of the May 15 Order (June 5th), and if they fail to do so, then Cox must produce the information. *See* 5.15.15 Hearing Tr. at 33:10-34:19 ("If they put you on notice but don't follow up with the Court, they just merely send you an e-mail, and the time period has run with the Court, then you will have to do a supplemental production and produce the information.") As of June 5, only one subscriber has filed their objections with the Court – the subscriber associated with IP address # 240 on Plaintiffs' Exhibit 4 to their motion to compel. Therefore, please immediately produce the PII with respect to these other 48 subscribers. If you decline, please let us know by close of business tomorrow your reasons for failing to abide by the Court's May 15 Order.

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Please also explain why Cox was “unable” to identify subscribers for a large portion of the IP addresses identified in your worksheet two, to which you indicated “no information available.”

Regards,

/s/ Paul A. Gennari

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